



431 River Road
Bow, NH 03304

December 9, 2020

Submitted electronically to R1NPDESReporting@epa.gov

U.S. Environmental Protection Agency
Water Division
NPDES Applications Coordinator
5 Post Office Square - Suite 100 (06-03)
Boston, MA 02109-3912

Reference: NPDES Permit No. NH0001465, Merrimack Station, GSP Merrimack LLC,
issued May 22, 2020.

Dear Sir/Madam:

In accordance with Part I.F.4., of the NPDES permit (see Reference), Granite Shore Power LLC (GSP) submits the attached report, "Evaluation of Ambient pH in the Merrimack River at the Cooling Water Intake of Merrimack Station," prepared for GSP by Normandeau Associates, Inc. (Normandeau). This report demonstrates that the current range of the discharge pH limits should be widened due to naturally occurring conditions in the receiving water.

As you know, the pH of the ambient river has been continuously monitored by Merrimack Station at Station N-5 located at the screenhouse intake for Unit 2 for several decades. In the report, Normandeau has compiled a 17.5-year history of this pH data extending from June 2002 through December 2019. The data shows that the naturally occurring pH of the river was recorded outside of the permit range of 6.5 SU to 8.0 SU on an average of 5-percent of the time. GSP believes this frequency of occurrence supports Normandeau's recommendation that the pH limits should be widened to 6.0 SU to 8.5 SU. Moreover, since the naturally occurring pH has been measured as high as 8.48 SU, GSP requests the range be expanded to the federally established range of 6.0 SU to 9.0 SU.

If you have any questions regarding this report, please call Allan Palmer, Senior Engineer, at (603) 230-7951.

Sincerely,

GRANITE SHORE POWER

Elizabeth H. Tillotson
Executive Director of Administration & Regulatory Affairs

Attachment: Normandeau Report

U.S. Environmental Protection Agency

Page 2

December 9, 2020

ecc: Ms. Nancy Lesieur (nancy.m.lesieur@des.nh.gov)
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